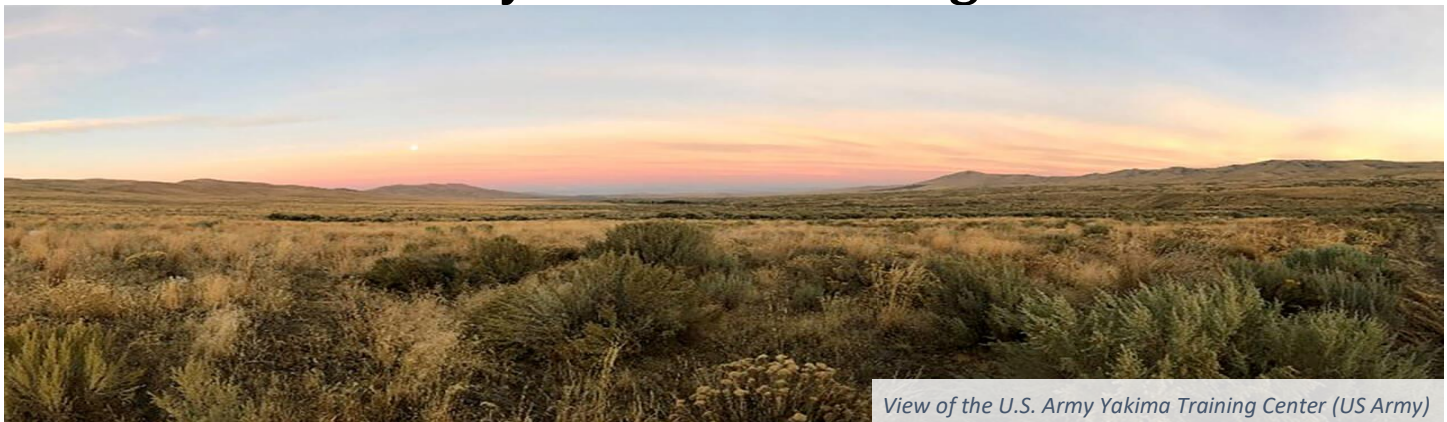


Statement of Basis - Permit for Corrective Action U.S. Army Yakima Training Center



Comments accepted:

Feb. 6, 2023 – Mar. 22, 2023

Submit comments

Online:

ecology.wa.gov/YTC-comment

By mail:

Kurt Walker, Site Manager
1250 W. Alder Street
Union Gap, WA 98903
509-934-0386

kurt.walker@ecy.wa.gov

Site Information:

Webpage:

ecology.wa.gov/YTC

Facility Site ID: 105

Site Cleanup ID: 2301

Need Help?

Contact Sheila Coughlan,
Community Outreach Specialist
at 360-480-7127 or

sheila.coughlan@ecy.wa.gov

We want to hear from you!

Ecology invites you to review and comment on a Permit for Corrective Action and Enforcement Order No. DE 21499 (EO) issued to the U.S. Army related to activities at the Yakima Training Center (YTC) in Yakima, WA where releases of hazardous substances have occurred.

Documents for Public Review

Permit for Corrective Action

The permit for corrective action provides oversight and a regulatory framework regarding dangerous waste activities, including cleanup.

Enforcement Order (EO)

This EO requires the Army to develop a Remedial Investigation (RI) Work plan, implement an approved RI, conduct a Feasibility Study (FS), and prepare a preliminary Draft Cleanup Action Plan (dCAP).

Public Participation Plan

The public participation plan describes how we will inform the community about the site activities and opportunities to engage in the process.

State and Federal Oversight

The Resource Conservation and Recovery Act (RCRA), 42 US Code 6901et. seq., grants the United States Environmental Protection Agency (EPA) authority to control hazardous substances from cradle to grave. EPA has delegated the primary responsibility of implementing the RCRA hazardous waste program, including permits, to most states including WA. While WA maintains the lead and implements RCRA authorized regulations under Washington Administrative Code (WAC) 173-303, EPA may retain authority to file additional enforcement actions.

The Statement of Basis is not enforceable itself, rather it is a supporting reference document that provides a rationale for the development of the permit and offers clarification for the permittee and the public.

Site Background

YTC is owned and operated by the US Army as a sub-installation of Joint Base Lewis-McChord (JBLM). It is located about 100 air miles east of JBLM and about 5 miles northeast of Yakima. YTC covers over 327,000 acres in Yakima and Kittitas Counties. Prior to military training, the land was used for ranching and mining operations.

YTC's on-base community is mostly visiting soldiers doing maneuvers and weapons training. There are no permanent residents. The training center also houses several military or federal government tenants, including the State of Washington Army National Guard Materials and Training Equipment Site, and the Marine and Army Reserve Centers.



Early training at YTC (US Army)

Past Contamination and Cleanup at the Site, and Need for Additional Work

Although YTC has been in nearly continuous use since the early 1940's, there are few records of waste management practices prior to 1984. Since 1980, the Army has owned and operated YTC as a Dangerous Waste Management Facility under the RCRA, 42 US Code 6925.

Activities that use chemical products and can generate hazardous wastes occur at the YTC. The environmental pollution to be addressed on site includes releases (spills and leaks) of hazardous substances and toxic waste from past military and maintenance operations involving:

- Petroleum-based fuels (gasoline, diesel, and Jet-A)
- Solvents such as TCE and MEK
- Lead-acid batteries from vehicles
- Ordnance, explosives, and other pyrotechnics (unneded or outdated ammunition and weapons)
- Per- and polyfluoroalkyl substances (PFAS) used in fire-fighting foams.



Modern vehicle and troop movements at YTC (Tacoma News Tribune)



Open-burn disposal of munitions and/or weapons at YTC (US Army)

A 1995 Facility Assessment report identified 115 known or potentially polluted areas within the YTC including a pesticide handling area, ammunition storage point burn pits, tracked vehicle repair shop/old mobilization and training equipment site, landfills, burn pits, fire training pits, buried munitions, underground fuel tanks, and fuel facilities. These contaminated areas are mostly within the cantonment or residential area (i.e. barracks) near the community of East Selah.

Since 1995, about a dozen more areas have been discovered. By 2013, the Army had investigated these areas and taken various remedial actions to clean up more than 80 percent of them. Those cleanups happened under Ecology oversight, but not under a

permit or legal order. While much has been done, there are still more areas to clean up at YTC which either do not meet soil or groundwater cleanup standards or have yet to be properly investigated. Other sites require ongoing groundwater monitoring and/or formal land use controls.

An Emerging Threat from PFAS

In 2021, the Army began testing drinking water wells near the YTC for toxic per- and polyfluoroalkyl substances (PFAS). PFAS is a known human health hazard. On-base Army operations use of products containing aqueous film foaming foam (AFFF), used for firefighting purposes, is believed to have contaminated groundwater at the YTC and off-base drinking water wells west of the YTC.

The Army has tested over 300 private wells, finding 87 homes so far that exceed the EPA's health advisory limit. Additionally, dozens more homes have tested above WA Dept. of Health's state action levels for PFAS which are more stringent than federal standards.



Military firefighters using fire-fighting foam (McDonald)

Permit for Corrective Action

Ecology requires environmental cleanup or "corrective action" at dangerous waste management facilities with releases of dangerous wastes to soil, groundwater, or surface water. Facility owners or operators must institute corrective action as necessary to protect human health and the environment from releases of dangerous waste. Ecology uses the state cleanup law, the Model Toxics Control Act (MTCA), to conduct all environmental cleanups, including corrective action.



Soldiers training at YTC (US Army)

Ecology is requiring that the US Army fulfill corrective action responsibilities for the YTC, as defined by WAC 173-303-040, using MTCA, (Chapter 70A.305 RCW), as amended, and its implementing regulation (Chapter 173-340 WAC), and the Dangerous Waste Regulation (Chapter 173-303 WAC – specifically, WAC 173-646). The actions taken must meet or exceed all substantive corrective action requirements of RCRA, the state Hazardous Waste Management Act (HWMA), and the Dangerous Waste Regulations.

The Army's corrective action obligations with respect to YTC under Enforcement Order No. DE 21499 are enforceable conditions of this Permit under the authority of Chapter 70A.300 RCW, and its implementing regulations,

Chapter 173-303 WAC. Modifications to Enforcement Order No. DE 21499 do not require a permit modification, except when required by WAC 173-340-600. Regardless of whether or not the Enforcement Order is vacated, the Army's corrective action obligations continue to be enforceable conditions of this permit under the authority of the HWMA, Chapter 70A.300, and its implementing regulations, Chapter 173-303 WAC.

The permit is effective as of February 1, 2023, and shall remain in effect until January 31, 2033, unless revoked and reissued, modified, or terminated under WAC 173-303-830(3) and (5) or continued in accordance with WAC 173-303-806(7). The Army shall submit a new application for a final permit not less than 180 days prior to the expiration date of this permit.

Public Meetings

At this time there are no public meetings scheduled for this comment period. You may request a public meeting by contacting Ecology's Communications and Outreach Specialist, Sheila Coughlan at 360-480-7127 or sheila.coughlan@ecy.wa.gov

Document Review Locations

In-person document review is available. Our office is open to the public. However, we encourage you to make an appointment prior to your arrival.

Washington State Department of Ecology
Central Regional Office
1250 West Alder Street
509-575-2490
Union Gap, WA 98903-0009

To schedule an appointment, please contact:

Jacklyn Cooper at 509-208-4591

jacklyn.cooper@ecy.wa.gov

Public Disclosure Coordinator

You can also review documents on our website: <https://ecology.wa.gov/YTC>.

Questions about accessing information?

Contact Sheila Coughlan:

360-480-7127

sheila.coughlan@ecy.wa.gov

What Happens Next?

When the comment period ends, we will consider all comments and may change the contents of the Permit or Enforcement Order based on public feedback. After fully considering all comments, the Permit and Enforcement Order will become final.

¿Qué pasa después?

Cuando finalice el período de comentarios, consideraremos todos los comentarios y podremos cambiar el contenido del permiso o la orden de ejecución en función de los comentarios del público. Después de considerar completamente todos los comentarios, la Orden de Permiso y Ejecución será definitiva.



Join the Discussion!



Figure 1: YTC Google Map Location

Permit and Enforcement Order

Ecology seeks public comment on the Permit and Enforcement Order issued to the U.S. Army related to activities at the Training Center in Yakima, WA.

Public comment period

Feb 6, 2023 – Mar 22, 2023

ecology.wa.gov/YTC-comment

Información en español incluida:

El Departamento de Ecología está anunciando el periodo de comentario público relacionado a la limpieza ambiental del sitio U.S. Army Yakima Training Center. Para obtener este documento, o más información sobre este sitio, en español, favor de comunicarse con Gretchen Newman al 360-407-6097 o preguntas@ecy.wa.gov.

ADA Accessibility: To request an ADA accommodation, contact Ecology by phone at 360-407-6700, email hwtrpubs@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.